

## LAW OFFICES OF JILL R. SHELLOW

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### **All Correspondence During COVID Pandemic:**

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August 30, 2021

### **ECF FILING REDACTED**

Honorable Lewis J. Liman  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312  
[LimanNYSDChambers@nysd.uscourts.gov](mailto:LimanNYSDChambers@nysd.uscourts.gov)

**Re: *USA v. Isabella Pollok*, 20-Cr-110 (LJL)**

Dear Judge Liman:

David Bertan and I represent Isabella Pollok. Last week we learned that Ms. Pollok has documents of other individuals that are arguably protected by HIPAA. These records were found in a location where the Government executed search warrants, but they were not seized by the Government. Our paralegal has sorted, scanned, and counted the pages. We have not read the documents. More specifically, Ms. Pollok has approximately 325 pages of Jane Doe #2's [REDACTED] records. Ms. Pollok also has approximately 52 pages of [REDACTED]'s records, four pages of [REDACTED]'s documents and approximately 430 pages of records of [REDACTED]. Ms. Pollok may have other, similar documents that we have not yet located, including in other locations that the Government has searched.

In light of the pending litigation on whether documents of this nature are privileged, we respectfully seek direction from Your Honor about how we should handle these records. Although neither [REDACTED] nor [REDACTED] have sought to intervene in the pending litigation, both are represented by counsel, and we have provided the unredacted version of this letter to their attorneys.

Respectfully submitted,



Jill R. Shellow  
David K. Bertan

JRS/DKB

cc: All Counsel (by email)